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Attorney for Plaintiff

SUPERIOR COURT OF CALIFORNIA, COUNTY OF KINGS

THE PEOPLE OF THE STATE OF CALIFORNIA
Plaintiff,

vs.

HOLLY EVELYN BLAIR
AKA HOLLY TRUMBLY, HOLLY ANDRADE

Defendant

No.

COMPLAINT

The undersigned, verifying upon information and belief, complains that in the County of Kings, State of California, the defendant did commit the following crime(s):

Count 1

On or about June 5, 2019, in the County of Kings, State of California, the crime of Assault With A Deadly Weapon in violation of **PC245(a)(1)**, a **Felony**, was committed in that **HOLLY EVELYN BLAIR** did willfully and unlawfully commit an assault upon Kevin Cosper with a deadly weapon, to wit, a vehicle. NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c).

Bail: \$25,000

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Count 2

On or about June 5, 2019, in the County of Kings, State of California, the crime of Assault With A Deadly Weapon in violation of **PC245(a)(1)**, a **Felony**, was committed in that **HOLLY EVELYN BLAIR** did willfully and unlawfully commit an assault upon R.G., a minor with a deadly weapon, to wit, a vehicle. NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c).

Bail: \$25,000

Count 3

On or about June 5, 2019, in the County of Kings, State of California, the crime of Assault With A Deadly Weapon in violation of **PC245(a)(1)**, a **Felony**, was committed in that **HOLLY EVELYN BLAIR** did willfully and unlawfully commit an assault upon Crystal Giles with a deadly weapon, to wit, a vehicle. NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c).

Bail: \$25,000

Count 4

On or about June 5, 2019, in the County of Kings, State of California, the crime of Evading An Officer, Willful Disregard in violation of **VC2800.2(a)**, a **Felony**, was committed in that **HOLLY EVELYN BLAIR** did willfully and unlawfully, while operating a motor vehicle and with the intent to evade, flee and otherwise attempt to elude a pursuing peace officer's motor vehicle while all of the following conditions existed: the peace officer's motor vehicle exhibited at least one lighted red lamp visible from the front and the defendant, **HOLLY EVELYN BLAIR** saw and reasonably should have seen the lamp, the peace officer's motor vehicle was sounding its siren as was reasonably necessary, the peace officer's motor vehicle was distinctively marked, the peace officer's motor vehicle was operated by a peace officer.

IT IS FURTHER ALLEGED that the defendant, **HOLLY EVELYN BLAIR** drove with a willful wanton disregard for the safety of persons and property.

Bail: \$35,000

Count 5

On or about June 5, 2019, in the County of Kings, State of California, the crime of Cruelty To Child By Endangering Health in violation of **PC273a(b)**, a **Misdemeanor**, was committed in that **HOLLY EVELYN BLAIR** was a person having the care and custody of C.B., a child of 13 years, who, under circumstances and conditions other than those likely to produce great bodily injury and death, did willfully cause and permit the person and health of said child to be injured, and did willfully cause and permit said child to be placed in such a situation that its person and health may be endangered.

Bail: \$5,000

Count 6

On or about June 5, 2019, in the County of Kings, State of California, the crime of Resist, Obstruct, Delay Of Peace Officer Or Emt in violation of **PC148(a)(1)**, a **Misdemeanor**, was committed in that **HOLLY EVELYN BLAIR** did willfully and unlawfully resist, delay and obstruct Osvaldo Maldonado who was then and there a peace officer attempting to and discharging the duty of his/her office and employment.

Bail: \$5,000

Count 7

On or about June 5, 2019, in the County of Kings, State of California, the crime of Reckless Driving In An Offstreet Parking Facility in violation of **VC23103(b)**, a **Misdemeanor**, was committed in that **HOLLY EVELYN BLAIR** drove a vehicle in an offstreet parking facility in willful and/or wanton disregard for the safety of persons or property.

Bail: \$5,000

I DECLARE UNDER PENALTY OF PERJURY BASED UPON INFORMATION AND BELIEF THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 7 COUNT(S).

**BASED UPON THE ABOVE ENTITLED CHARGES, THE PEOPLE HEREBY
REQUEST BAIL IN THE AMOUNT OF \$100,000**

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